

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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THOMAS M. FLOHR d/b/a EMERGING	:	FILE NO. 07 CV 2920 (RWS)
MARKETS GROUP,	:	
	:	ECF CASE
Plaintiff,	:	
	:	
v.	:	
	:	
INTERNATIONAL BUSINESS ASSOCIATES,	:	
LTD.,	:	
	:	
First Defendant,	:	
	:	
INTERNATIONAL BUSINESS ASSOCIATES	:	
HOLDINGS CO., LTD., INTERNATIONAL	:	
BUSINESS ASSOCIATES (USA), INC., JOHN	:	
KEAN, JR., and STANLEY J. BROWNELL,	:	
	:	
Second Defendants,	:	
	:	
HARKEN ENERGY CORPORATION,	:	
	:	
Third Defendant.	:	
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**NOTICE OF MOTION AND MOTION FOR AN ORDER PERMITTING CONNELL
FOLEY LLP TO WITHDRAW AS COUNSEL FOR DEFENDANTS INTERNATIONAL
BUSINESS ASSOCIATES, LTD., INTERNATIONAL BUSINESS ASSOCIATES
HOLDINGS CO., LTD., INTERNATIONAL BUSINESS ASSOCIATES (USA), INC.,
JOHN KEAN, JR., AND STANLEY BROWNELL**

PLEASE TAKE NOTICE that Pursuant to Local Civil Rule 1.4 and the attached affidavit of Peter J. Pizzi, sworn on June 11, 2007 (attached hereto as Exhibit "A") Connell Foley LLP, attorneys for defendants International Business Associates, Ltd., International Business Associates Holdings Co., Ltd., International Business Associates (USA), Inc., John Kean, Jr., and Stanley Brownell, will move before this Court on a date and time to be determined, before the Honorable Robert W. Sweet, United States District Judge, in Courtroom

1920 of the United States Courthouse located at 500 Pearl Street, New York, New York, for an Order permitting CONNELL FOLEY LLP to withdraw as counsel for Defendants International Business Associates, Ltd., International Business Associates Holdings Co., Ltd., International Business Associates (USA), Inc., John Kean, Jr., and Stanley Brownell, on the grounds that Defendant International Business Associates, Ltd., International Business Associates Holdings Co., Ltd., International Business Associates (USA), Inc., John Kean, Jr., and Stanley Brownell, has chosen to engage other counsel to defend it in the above-entitled related actions.

PLEASE TAKE FURTHER NOTICE that, if necessary, the time and date of this motion will be set by the parties or the Court.

Dated: June 11, 2007

s/ Peter J. Pizzi
Peter J. Pizzi, Esq. (PP6500)
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Ltd., International Business Associates (USA),
Inc. John Kean, Jr., and Stanley J. Brownell

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